

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

---

HIGHFIELDS CAPITAL LTD.,	:	
HIGHFIELDS CAPITAL I LP,	:	
HIGHFIELDS CAPITAL II LP,	:	
Plaintiffs,	:	Civ. No. 04-10624 (MLW)
v.	:	
SCOR, S.A.,	:	
Defendant.	:	

---

**PROPOSED ORDER ON DEFENDANT SCOR'S MOTION TO DECLARE  
HIGHFIELDS' INVESTOR LISTS NOT "PRIVILEGED MATERIAL"**

PENDING BEFORE THE COURT is the Motion brought by Defendant SCOR to declare that certain documents that appear to comprise investor lists related to the investors in, or membership of, Highfields Capital Ltd., Highfields Capital I LP and Highfields Capital II LP (collectively, "Highfields") are not protected from disclosure in the above-captioned action as Privileged Material (as that term is defined in the *Stipulation and Protective Order* entered by this Court on February 27, 2006).

The Court, having considered this Motion, the supporting Memorandum of Law and the Declaration of Douglas H. Meal, and any opposition and reply thereto, is of the opinion that it should be, and hereby is:

**ORDERED** that the motion is hereby **GRANTED**;

1. Plaintiffs are ordered to produce, in full, all contested documents by \_\_\_\_\_, 2006.

2. Plaintiffs shall reimburse defendant in full for defendants' attorneys' fees and costs associated with this Motion.

SIGNED at Boston, Massachusetts this \_\_\_ day of \_\_\_\_\_, 2006.

---

HON. MARK L. WOLF  
UNITED STATES DISTRICT JUDGE